

# EXHIBIT A

**Service of Process  
Transmittal**

01/18/2022

CT Log Number 540891425

**TO:** Dede Hassell  
American Airlines Group Inc.  
1 SKYVIEW DRIVE, MD 8B503  
FORT WORTH, TX 76155

**RE: Process Served in North Carolina**

**FOR:** American Airlines, Inc. (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: WANDA JOAN YORK // To: American Airlines, Inc.

**DOCUMENT(S) SERVED:** --

**COURT/AGENCY:** None Specified  
Case # 22CV56

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Raleigh, NC

**DATE AND HOUR OF SERVICE:** By Certified Mail on 01/18/2022 postmarked on 01/12/2022

**JURISDICTION SERVED :** North Carolina

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 01/18/2022, Expected Purge Date: 01/23/2022

Image SOP

Email Notification, Dede Hassell dede.hassell@aa.com

Email Notification, Mckenzie Brown mckenzie.brown@aa.com

Email Notification, Tracy Adair tracy.adair@aa.com

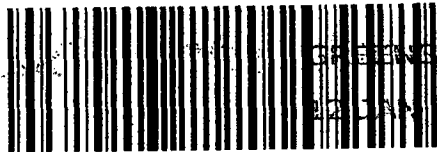
**REGISTERED AGENT ADDRESS:** CT Corporation System  
160 Mine Lake CT  
Suite 200  
Raleigh, NC 27615  
866-665-5799  
SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



WE STAND UP FOR YOU®

2400 Freeman Mill Road, Suite 200  
Greensboro, NC 27406



7020 1290 0001 1801 8745

GREENSBORO NC 27406

12 JAN 2022 PM 1:14



US POSTAGE

\$07.53<sup>0</sup>

First-Class

Mailed From 28601

01/11/2022

032A 0061844024

***CERTIFIED MAIL, RETURN RECEIPT REQUESTED***

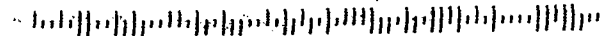
American Airlines, Inc.

c/o CT Corporation System

160 Mine Lake Court Suite 200

Raleigh, NC 27615

27615-641760



# STATE OF NORTH CAROLINA

File No.

22 CV 56

FORSYTH

County

In The General Court Of Justice

☐ District ☒ Superior Court Division

Name Of Plaintiff

WANDA JOAN YORK

Address

Crumley Roberts, LLP, 2400 Freeman Mill Road, Suite 200

City, State, Zip

Greensboro, NC 27406

**VERSUS**

## CIVIL SUMMONS

☐ ALIAS AND PLURIES SUMMONS (ASSESS FEE)

G.S. 1A-1, Rules 3 and 4

Name Of Defendant(s)

AMERICAN AIRLINES, INC.

Date Original Summons Issued

Date(s) Subsequent Summons(es) Issued

### To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1

AMERICAN AIRLINES, INC.

c/o CT Corporation System

160 Mine Lake Court, Suite 200

Raleigh, NC 27615

Name And Address Of Defendant 2



**IMPORTANT! You have been sued! These papers are legal documents; DO NOT throw these papers out! You have to respond within 30 days. You may want to talk with a lawyer about your case as soon as possible, and, if needed, speak with someone who reads English and can translate these papers!**

**¡IMPORTANTE! ¡Se ha entablado un proceso civil en su contra! Estos papeles son documentos legales. ¡NO TIRE estos papeles!**

**Tiene que contestar a más tardar en 30 días. ¡Puede querer consultar con un abogado lo antes posible acerca de su caso y, de ser necesario, hablar con alguien que lea inglés y que pueda traducir estos documentos!**

### A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff)

Karonnie R. Truzy

Crumley Roberts, LLP

2400 Freeman Mill Road, Suite 200

Greensboro, NC 27406

Date Issued

1/5/2022

Time

1:44

☐ AM

☒ PM

Signature

*Brynn Mobley*

☐ Deputy CSC

☒ Assistant CSC

☐ Clerk Of Superior Court

### ☐ ENDORSEMENT (ASSESS FEE)

This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement

Time

☐ AM

☐ PM

Signature

☐ Deputy CSC

☐ Assistant CSC

☐ Clerk Of Superior Court

**NOTE TO PARTIES:** Many counties have **MANDATORY ARBITRATION** programs in which most cases where the amount in controversy is \$25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.

(Over)

AOC-CV-100, Rev. 4/18

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**RETURN OF SERVICE**

I certify that this Summons and a copy of the complaint were received and served as follows:

**DEFENDANT 1**

Date Served

Time Served

☐ AM☐ PM

Name Of Defendant

- ☐ By delivering to the defendant named above a copy of the summons and complaint.
- ☐ By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- ☐ As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

- ☐ Other manner of service (specify)

- ☐ Defendant WAS NOT served for the following reason:

**DEFENDANT 2**

Date Served

Time Served

☐ AM☐ PM

Name Of Defendant

- ☐ By delivering to the defendant named above a copy of the summons and complaint.
- ☐ By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- ☐ As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

- ☐ Other manner of service (specify)

- ☐ Defendant WAS NOT served for the following reason:

Service Fee Paid

\$

Signature Of Deputy Sheriff Making Return

Date Received

Name Of Sheriff (type or print)

Date Of Return

County Of Sheriff

NORTH CAROLINA  
FORSYTH COUNTY

FILED IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

21CVS 6  
22

WANDA JOAN YORK,  
Plaintiffs,

2021 JUN -5 P, 1:44

) C.S.C.

v.

BLM

AMERICAN AIRLINES, INC.,

Defendant.

COMPLAINT  
(Jury Trial Demanded)

COMES NOW, the Plaintiff, by and through counsel, complaining of the Defendant,  
alleging the following:

**PARTIES**

1. The Plaintiff, Wanda Joan York, is a citizen and resident of Clemmons, Forsyth County, North Carolina.
2. The Defendant, American Airlines, Inc., is a foreign corporation duly organized and existing under the laws of the state of North Carolina, is properly registered with the North Carolina Secretary of State, and is authorized to do business in the State of North Carolina.
3. On or about November 9, 2019, Plaintiff purchased a ticket from Defendant for Flight 5384 from Greensboro, North Carolina to Charlotte North Carolina departing from Piedmont Triad International Airport, Greensboro, North Carolina.
1. Upon information and belief, the Flight 5384 was scheduled to board at 6:30 am on November 9, 2019.
2. Upon information and belief, the Defendant operated Flight 5384 and the boarding of its passengers at Piedmont Triad International Airport, located in Greensboro, North Carolina.
3. At all times complained of herein, the Defendant owned, operated, controlled and were responsible for the inspection, maintenance, management supervision and boarding of Flight 5384 leaving from the Piedmont Triad International Airport, located in Greensboro, North Carolina.

4. On or about November 9, 2019 at approximately 6:45 a.m. the Plaintiff attempted to enter upon Flight 5384 which was controlled by the Defendant as a customer of the Defendant.
5. Plaintiff's intentions were to board Flight 5384 to Charlotte, North Carolina.
6. At or about 6:45 a.m., the Plaintiff's flight to Charlotte began to board and employees/agents of the Defendant directed passengers to board the plane.
7. Upon information and belief, Defendant's employees and/or agents directed Plaintiff on how Flight 5384 should be boarded.
8. Because of Plaintiff's age, she had trouble boarding using the regular steps that were used on the flight.
9. While a ramp was available, Defendant failed to make said ramp accessible to passengers, including the Plaintiff.
10. As the Plaintiff attempted to walk up the steps to the plane, she fell forward causing her to sustain personal injury to her leg and hands.
11. Upon information and belief, the Defendant was under a duty to maintain the area in question and ensure that the area was safe for all passengers to enter Flight 5384.
12. As a result of Defendant's omissions and failure to maintain the area, they created an unsafe and hazardous area with the conditions not readily apparent or obvious to their customers, including the Plaintiff.
13. While the said dangerous condition was not apparent to the Plaintiff, the Defendant, by and through its agents and employees, had actual or constructive notice of the dangerous condition which existed and was aware that customers did not know of the existence of the said dangerous condition; and the Defendant took no steps to either warn its invitees of the hazard or to make the conditions safe for its invitees.
14. The Defendant was responsible at all times complained of herein for the inspection, maintenance, management, supervision, and repair of certain portions of the premises including the boarding area.
15. All of the Plaintiff's aforesaid injuries and damages were directly and proximately caused by the careless and negligent conduct of the Defendant, acting through its agents and employees all of whose names are unknown to the Plaintiff but whose names are well

known to the Defendant, and the said agents and employees were acting within the course and scope of their agency or employment, and the negligence of the Defendant and its agents and employees consisted of the following acts and omissions:

- a. The agents and employees of the Defendant, while having actual or constructive knowledge of the existence of the said dangerous condition of the loading ramp, failed to warn the Plaintiff and other invitees that the dangerous condition existed;
  - b. The agents and employees of the Defendant failed to make any effort to remove the said dangerous condition, being aware that the Plaintiff and other invitees of the Defendant would board using the same boarding ramp and carry them over or near the dangerous condition;
  - c. The agents and employees of the Defendant failed to make reasonable inspection of the Defendants' premises, which inspection would have revealed the dangerous condition, and would have allowed the said agents and employees to remove the said dangerous condition;
  - d. The agents and employees of the Defendant failed to take any steps to make safe the dangerous condition existing on the plane's entry ramp; and
  - e. The agents and employees of the Defendant failed to provide adequate notice of the dangerous condition to enable the Plaintiff to see or be aware of the said dangerous condition.
16. As a direct and proximate result of Defendants' negligence, the Plaintiff fell, was injured, and was forced to seek emergency and follow up medical treatment and incur medical expenses, property damage, lost wages, and thus has suffered physical pain, scarring and mental suffering .
17. That as a direct and proximate result of the aforesaid negligence of the Defendant, the Plaintiff seeks damages in an amount in excess of twenty-five thousand dollars (\$25,000.00) (pled pursuant to Rule 8(a)(2) of the North Carolina Rules of Civil Procedure) to be determined at the trial of this matter.

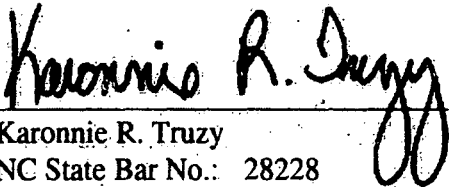
WHEREFORE, the Plaintiff respectfully prays the Court that:

1. That the Plaintiff have and recover judgment against the Defendant for an amount in excess of Twenty-five Thousand Dollars (\$25,000.00) in compensatory damages, together with interest as provided by law;



2. All costs of this action, including counsel fees, be taxed against the Defendant;
3. That Plaintiff be awarded punitive damages against the Defendant;
4. For interest on any compensatory award from the date of the institution of this action as provided by N.C.G.S. § 24-1, and 24-5;
5. A jury trial be granted; and
6. For such other and further relief as shall be deemed just and proper.

This the 22 day of December, 2021.



Karonnie R. Truzy

NC State Bar No.: 28228

CRUMLEY ROBERTS, LLP

2400 Freeman Mill Road, Suite 200

Greensboro, NC 27406

Telephone: (336) 333-9899

Ktruzy@crumleyroberts.com